

Exhibit A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION

TRACEY JACKSON,

Plaintiff,

v.

IVY TECH COMMUNITY COLLEGE
OF INDIANA,

Defendant.

Case No. 1:24-cv-00954-TWP-KMB

**PLAINTIFF'S RESPONSE TO DEFENDANT'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS**

The Plaintiff, Tracey Jackson, by counsel submits the following responses to
Defendant's First Request for Production of Documents:

Plaintiff has not completed the investigation, discovery, and preparation for trial, nor has it concluded the analysis of information gathered to date. These responses and objections therefore, are based on information presently available to and in the possession of Plaintiff and its attorneys. Further discovery and independent investigation may lead to supplementation and amendment of the following responses and objections, and Plaintiff hereby expressly reserves the right to amend and/or supplement these responses and objections.

DOCUMENT REQUESTS

REQUEST NO. 1: All documents (as defined in Defendant's First Set of Interrogatories to Plaintiff) identified in, referred to, or relied upon in preparing your answers to Defendant's First Interrogatories to Plaintiff.

REQUEST NO. 30: All medical records, doctor's reports, hospital records, psychotherapy records, psychologist records, social worker's notes, and all other medical-related documentation from any health care provider or counselor pertaining to any emotional, mental, or physical condition that you allege to have suffered or experienced as a result of the conduct alleged in your Complaint. In addition, please provide a signed and completed medical authorization allowing Defendant to obtain a full and complete copy of such records, the form for which is attached as Exhibit A.

RESPONSE: Plaintiff has requested the necessary documentation from her healthcare providers and will submit the responses after a protective order has been entered into between the parties. The Plaintiff will designate all medical documents as "Attorney Eyes Only."

REQUEST NO. 31: All medical records, doctor's reports, hospital records, psychotherapy records, psychologist records, social worker's notes, and all other medical-related documentation from any health care provider or counselor related to any physical injuries, illnesses, or diseases for which you received treatment in the last five (5) years and for any mental, emotional, or psychological injuries, illnesses, addictions, diseases, or other problems for which you have received treatment, regardless of the date. In addition, please provide a signed medical authorization allowing Defendant to obtain a full and complete copy of such records, the form for which is attached as Exhibit A.

RESPONSE: Plaintiff objects to this request as overly broad and unduly burdensome. The burden or expense of complying with this request outweighs its likely benefit, considering the needs of the case, the importance of the issues at stake in action, and the importance of the

discovery in resolving the issues. Further, this request seeks information that is not relevant to the claims or defenses of the parties in this litigation. Subject to and without waiving objections, Plaintiff has requested the necessary documentation from her healthcare providers and will submit the responses after a protective order has been entered into between the parties. The Plaintiff will designate all medical documents as “Attorney Eyes Only.”

REQUEST NO. 32: Each document that reflects or evidences your earnings or income from any source since May 1, 2023, including without limitation your federal and state income tax returns (along with all schedules and W-2 forms) for the years 2023 through the present, and any pay stubs, payroll records, or earnings records for this time period.

RESPONSE: Please see Plaintiff’s Document Production Pages 075- 231.

REQUEST NO. 33: Any and all documents concerning any complaint(s) you, or anyone acting on your behalf, ever made to Defendant about alleged discrimination, harassment, or retaliation against you.

RESPONSE: Plaintiff objects to this Discovery Request as it calls for information that does not exist within the possession, custody, or control of Plaintiff, that is equally available to Defendant.

Subject to and without waiving objections, please see Pages 247-251, 254-261.

online communications and any online records of the jobs to which you submitted your application, the application you submitted, and the responses to such applications (and may include screenshots if they are the only method of producing such information).

RESPONSE: Please see Pages 232-246 of Plaintiff's Document Production and the attached spreadsheet outlining Plaintiff's job search.

Respectfully submitted,

/s/: Amber K. Boyd
Amber K. Boyd, #31235-49

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been forwarded to the below address via Electronic Mail on December 9, 2024:

Phillip J. Jones
Phillip.Jones@icemiller.com

Tami Earnhart
Tami.Earnhart@icemiller.com

/s/: Amber K. Boyd
Amber K. Boyd, #31235-49
AMBER BOYD LAW
8510 Evergreen Avenue
Indianapolis, IN 46240
Phone: 317-960-5070
amber@amberboydlaw.com